

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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<b>In Re:</b>	)	
	)	
<b>DENNIS E. HECKER,</b>	)	<b>Bankruptcy Case No: 09-50779-RJK</b>
	)	
<b>Debtor.</b>	)	<b>Chapter 7</b>
	)	
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<b>CHRYSLER FINANCIAL</b>	)	
<b>SERVICES AMERICAS</b>	)	<b>Adversary Proceeding No.: 09-05019</b>
<b>LLC,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>DENNIS E. HECKER,</b>	)	
	)	
<b>Defendant</b>	)	
	)	

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**AMENDED DECLARATION OF WILLIAM F. MOHRMAN IN SUPPORT  
OF DEFENDANT'S MOTION FOR A STAY**

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I, William F. Mohrman, after being first duly sworn, deposes and states as follows:

1. I am an attorney at Mohrman & Kaardal, P.A. and make this Declaration in Support of Defendant Dennis E. Hecker's Motion for a Stay based on the pending Grand Jury investigation.
2. Attached as Exhibit 2 to my original declaration filed in support on Defendant's Motion to Stay (Docket No. 15) was a December 17,

2007 e-mail from Mr. John Bowker, an employee of Plaintiff's, to Hecker and not the November 19, 2007 email referenced in the Memorandum.

3. Attached as Exhibit 3 to this Amended Declaration is a true and correct copy of Mr. John Bowker's November 19, 2007 email referenced in the Memorandum.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 24, 2009

s/William F. Mohrman

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William F. Mohrman

**Jim Gustafson**

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**From:** jb83@chryslerfinancial.com  
**Sent:** Monday, November 19, 2007 1:34 PM  
**To:** Heckerauto@aol.com  
**Cc:** Steve J. Leach; mjc20@chryslerfinancial.com; ts17@chryslerfinancial.com; Erik P. Dove  
**Subject:** Hyundai program

Denny,

Thanks for providing the Hyundai program for 4,855 units.

A few questions:

- 1) Why is the agreement with Walden Fleet Services II? Shouldn't this be Rosedale?
- 2) Are the marketing/advertising incentives limited to \$50.00/unit? No other incentives?
- 3) Hyundai is requiring an escrow account for payments (repurchase, mileage, incentive etc.). Should also be included in our block account agreement.
- 4) In addition, the agreement allows for CF to have an assignment of rights to vehicles purchased- please assist with HMA in obtaining.

John W. Bowker  
Chrysler Financial  
National Accounts Manager  
27777 Inkster Road  
Farmington Hills, MI 48334  
CIMS 405-23-05  
248-427-6509  
248-219-8001 (Cell)  
248-427-6569 (Fax)  
[jb83@chryslerfinancial.com](mailto:jb83@chryslerfinancial.com)

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MINNESOTA**

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**In Re:**

**DENNIS E. HECKER,**

**Debtor.**

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**CHRYSLER FINANCIAL SERVICES,  
AMERICAS LLC,**

**Plaintiff,**

**v.**

**DENNIS E. HECKER,**

**Defendant.**

**CERTIFICATE OF SERVICE**

**Bankruptcy Case No: 09-50779-RJK  
Chapter 7 Case**

**Adversary Proceeding No.: 09-05019**

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I hereby certify that on September 24, 2009, I caused the following document:

- Amended Declaration of William F. Mohrman in Support of Motion for Stay with Exhibit 3;

to be filed electronically with the Clerk of Court through ECF, and that ECF will send an e-notice of the electronic filing to the following:

- Matthew R. Burton    mburton@losgs.com
- Stephen F Grinnell    stephen.grinnell@gpmlaw.com

I further certify that I caused a copy of the foregoing documents and the notice of electronic filing to be mailed by first class mail, postage paid, to the following non-ECF participants: None.

Dated: September 24, 2009

**s/ William F. Mohrman**

William F. Mohrman